

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRIAN KEMP, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

**COALITION PLAINTIFFS' MOTION FOR
LEAVE TO FILE EXHIBITS OMITTED FROM PREVIOUSLY FILED
DDECLARATION OF HARRI HURSTI**

Coalition Plaintiffs respectfully move for leave to file Exhibit 1, which is the Declaration of Harri Hursti With Exhibits. The original Declaration of Harri Hursti was filed at Doc. 853-2 without accompanying Exhibits due to counsel's inability to assemble them on deadline while Mr. Hursti was traveling. Coalition Plaintiffs show that the declaration itself is identical and that the exhibits now attached are referenced in the original declaration. The attached exhibits themselves are helpful for a full understanding of the declaration. Two exhibits referenced by the Declaration (D and G) are unavailable to file at this time and thus a blank page is submitted herewith in their respective places, for completeness. These two exhibits (D and G) are illustrative only, and thus not material. References to these two exhibits (D and G) in the Hursti Declaration may be

disregarded.

Coalition Plaintiffs therefore respectfully move that leave be granted and that the attached be deemed filed.

A proposed order is attached.

Respectfully submitted this 2nd day of September, 2020.

/s/ Bruce P. Brown

Bruce P. Brown
Georgia Bar No. 064460
BRUCE P. BROWN LAW LLC
1123 Zonolite Rd. NE
Suite 6
Atlanta, Georgia 30306
(404) 881-0700

/s/ Robert A. McGuire, III

Robert A. McGuire, III
Admitted Pro Hac Vice
(ECF No. 125)
ROBERT MCGUIRE LAW FIRM
113 Cherry St. #86685
Seattle, Washington 98104-2205
(253) 267-8530

Counsel for Coalition for Good Governance

/s/ Cary Ichter

Cary Ichter
Georgia Bar No. 382515
ICHTER DAVIS LLC
3340 Peachtree Road NE
Suite 1530
Atlanta, Georgia 30326
(404) 869-7600

*Counsel for William Digges III, Laura Digges,
Ricardo Davis & Megan Missett*

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

E

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

CERTIFICATE OF COMPLIANCE

Pursuant to LR 7.1(D), I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ Robert A. McGuire, III
Robert A. McGuire, III

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER , ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

CERTIFICATE OF SERVICE

I hereby certify that on September 2, 2020, a copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record.

/s/ Robert A. McGuire, III
Robert A. McGuire, III

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

PROPOSED ORDER GRANTING MOTION FOR LEAVE

The matter coming before the Court on COALITION PLAINTIFFS' MOTION FOR LEAVE TO FILE EXHIBITS OMITTED FROM PREVIOUSLY FILED DECLARATION OF HARRI HURSTI. Good cause having been shown, the Motion is granted and the Exhibit 1 to the Motion will be deemed filed.

So Ordered this ___ day of September, 2020.

U.S. District Court Judge Amy Totenberg